

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHER DISTRICT OF MISSISSIPPI
GREENVILLE DIVISION**

DENNIS BALLARD, et al.

PLAINTIFFS

V.

CIVIL ACTION NO.: 4:23-cv-00161-DMB-JMV

**WILLIAM J. “JERRY” NOBILE,
JERRY NOBILE FARMS, INC.,
WILLIAM J. “WILL” NOBILE, JR.,
WILL NOBILE FARMS, INC.**

DEFENDANTS

**UNOPPOSED SECOND MOTION FOR ADDITIONAL TIME
TO RESPOND TO PLAINTIFFS’ COMPLAINT**

Defendants William J. “Jerry” Nobile, Jerry Nobile Farms, Inc., William J. “Will” Nobile, Jr., and Will Nobile Farms, Inc. (collectively “Defendants”), file this second motion for additional time to respond to Plaintiffs’ Complaint in the above matter. In support of this motion, Defendants state as follows:

1. Plaintiffs served Defendants with the Complaint on October 5, 2023.
2. The Court previously granted the Defendants’ motion for additional time to respond to the Complaint in order for the parties to engage in early settlement discussions.
3. Counsel for Defendants have exchanged a significant amount of information and Plaintiffs recently provided a settlement demand to Defendants. Defendants have been working to formulate their response to the Plaintiffs’ settlement demand. In doing so, the parties have determined that an early settlement conference with the United States Magistrate Judge will likely increase the opportunity for settlement discussions to be successful. The Plaintiffs have advised that they are agreeable to an in-person settlement conference.
4. Accordingly, the parties request that the Court schedule a settlement conference in January or February of 2024, and that the Defendants be provided seven (7) days after the

conclusion of the settlement conference to respond to the Plaintiffs' lengthy Complaint if the conference does not result in a settlement.

5. The additional time will allow the parties to focus on attempting to reach a resolution without expending fees in responding to Plaintiffs' lengthy Complaint.

6. Plaintiffs have advised that they do not oppose this motion.

7. Given the straightforward nature of this motion, Defendants request to be relieved of the requirement to submit a supporting memorandum pursuant to Local Uniform Civil Rule 7(b)(4).

WHEREFORE, PREMISES CONSIDERED, the Defendants pray that the Court seek an agreeable date for a settlement conference in January or February 2024 from counsel for the parties and extend the deadline for Defendants to respond to the Complaint to seven (7) days after the conclusion of the settlement conference if the conference does not result in a settlement.

Dated: December 22, 2023

Respectfully submitted,

**WILLIAM J. "JERRY" NOBILE, JERRY NOBILE
FARMS, INC., WILLIAM J. "WILL" NOBILE, JR.,
WILL NOBILE FARMS, INC., DEFENDANTS**

By: /s/ Timothy M. Threadgill
TIMOTHY M. THREADGILL (MB #8886)
FREDRICK J. BISSINGER (admitted *pro hac vice*)

THEIR ATTORNEYS

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CERTIFICATE OF SERVICE

I, Timothy M. Threadgill, do hereby certify that I have this day served via ECF filing and electronic mail a true and correct copy of the above and foregoing document to the following:

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Counsel for Plaintiffs

Dated: December 22, 2023

/s/ Timothy M. Threadgill
TIMOTHY M. THREADGILL